

1 RENE L. VALLADARES
2 Federal Public Defender
3 Nevada State Bar No. 11479
4 CHRISTOPHER P. FREY
5 Assistant Federal Public Defender
6 Nevada State Bar No. 10589
7 Chris Frey@fd.org
8 KATE BERRY
9 Assistant Federal Public Defender
10 Nevada State Bar No. 14346
11 Kate Berry@fd.org
12 200 S. Virginia Street, Ste. 340
13 Reno, Nevada 89501
14 (775) 321-8451/Phone

15 BRAD D. LEVENSON
16 Assistant Federal Public Defender
17 California State Bar No. 166073
18 Brad Levenson@fd.org
19 411 E. Bonneville, Ste. 250
20 Las Vegas, Nevada 89101
21 (702) 388-6577/Phone

22 THERESA M. DUNCAN
23 Duncan Earnest LLC
24 New Mexico State Bar No. 12444
25 teri@duncanearnest.com
26 222 East Marcy Street, Suite 1
Santa Fe, NM 87501
(505) 842-5196/Phone

27 Attorneys for JOHN MATTHEW CHAPMAN

28 **UNITED STATES DISTRICT COURT**

29 **DISTRICT OF NEVADA**

30 UNITED STATES OF AMERICA,

31 Plaintiff,

32 v.

33 JOHN MATTHEW CHAPMAN,

34 Defendant.

35 Case No. 2:20-cr-00091-JCM-DJA

36 **STIPULATION TO EXTEND
MOTION TO SUPPRESS REPLY
DEADLINE**
(Third Request)

1 IT IS HEREBY STIPULATED AND AGREED, by and between Federal Public
2 Defender Rene L. Valladares, and Assistant Federal Public Defenders Christopher P. Frey, Kate
3 Berry, Brad D. Levenson, and attorney Theresa M. Duncan, counsel for JOHN MATTHEW
4 CHAPMAN, United States Attorney Jason M. Frierson, Assistant United States Attorneys
5 Allison Reese and Lisa Cartier-Giroux, counsel for the United States of America, that the
6 deadline to file any and all replies to the Defendant's Motion to Suppress Statements (ECF No.
7 70) currently set for January 11, 2023 be continued to January 18, 2023.

8 The Stipulation to continue is entered into for the following reasons:

- 9 1. The Defense needs additional time to research the issues raised in the
10 Government's response and reply thoroughly and effectively.
- 11 2. Government counsel agrees with the continuance.
- 12 3. The parties agree to the continuance.

13 This is the third stipulation to continue reply deadlines.

14 DATED January 7, 2023.

15 RENE L. VALLADARES
16 Federal Public Defender

JASON M. FRIERSON
United States Attorney

17 By: /s/ Christopher P. Frey

18 CHRISTOPHER P. FREY
19 Assistant Federal Public Defender
Counsel for John Matthew Chapman

By: /s/ Allison Reese

ALLISON REESE
Assistant United States Attorney
Counsel for United States

20 By: /s/ Kate Berry

21 KATE BERRY
22 Assistant Federal Public Defender

By: /s/ Lisa Cartier-Giroux

LISA CARTIER-GIROUX
Assistant United States Attorney

23 By: /s/ Brad Levenson

24 BRAD LEVENSON
25 Assistant Federal Public Defender

26 By: /s/ Theresa M. Duncan

THERESA M. DUNCAN
Learned Counsel for John Matthew Chapman

ORDER

IT IS THEREFORE ORDERED that the deadline to file any and all replies to the Defendant's Motion to Suppress Statements (ECF No. 70) currently set for January 11, 2023 be continued to January 18, 2023.

DATED this 9th of January, 2023.

HONORABLE DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE